

K. Chad Burgess
Director & Deputy General Counsel
Dominion Energy Southeast Services, Inc.

220 Operation Way, MC C222, Cayce, SC 29033
DominionEnergy.com



May 26, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Actions in Response to COVID-19
Docket No. 2020-106-A

Dear Ms. Boyd:

Dominion Energy South Carolina, Inc. ("DESC" or "Company"), pursuant to Order No. 2020-372, issued by the Public Service Commission of South Carolina ("Commission"), submitted comments on Friday, May 22, 2020, in the above-referenced docket. In compliance with Commission Order No. 2020-40-H, enclosed you will find a written summary of DESC's comments.

Please be advised that the Company will present Samuel L. Dozier, Vice President of Customer Service at the Commission's Virtual Forum scheduled to begin at 10:00 a.m. on May 27, 2020. Mr. Dozier will deliver the Company's comments and be available for questioning. Additionally, Cristina V. Freeman, Manager of Customer Assistance, will be present on behalf of DESC and also available for questioning.

DESC looks forward to the opportunity to participate in the virtual forum tomorrow. If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in blue ink, appearing to read "K. Chad Burgess", written over a horizontal line.

K. Chad Burgess

KCB/kms
Enclosure

(Continued . . .)

cc: David Butler, Esquire
Alexander Knowles, Esquire
Carrie Grube-Lybarker, Esquire
Heather Shirley Smith, Esquire
Katie M. Brown, Esquire
M. John Bowen, Jr., Esquire
Charles L.A. Terreni, Esquire
Margaret M. Fox, Esquire
Rebecca J. Dulin, Esquire
Frank E. Ellerbe III, Esquire
Thadeus B. Culley, Esquire
Becky Swearingen, Esquire
John M.S. Hoefer, Esquire
Katherine N. Lee, Esquire
Samuel J. Welborn, Esquire
T. Richmond McPherson III, Esquire
(all via electronic mail only)

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2020-106-A

IN RE: Actions in Response to COVID-19 _____)))))	SUMMARY OF COMMENTS OF DOMINION ENERGY SOUTH CAROLINA, INC.
---	-----------------------	--

Good morning Chairman Randall and members of the Commission, my name is Sam Dozier, and I am the Vice President of Customer Service for Dominion Energy South Carolina, Inc. With me today, albeit in a different location, is Cristina Freeman who is the Company's Manager of Customer Assistance. She last appeared before you in the bill round up docket last year. Ms. Freeman serves in a very important role for the Company as she and her team are on the front line providing customers with opportunities to take advantage of financial assistance offered through the South Carolina Office of Economic Opportunity, the states' community actions agencies, and approximately 170 other organizations that provide bill pay assist to our customers. We are very proud of the work that Cristina and her team accomplish each day, and I trust that you'll feel the same as you learn more about what we've done to assist customers during the COVID-19 crisis. I'll be the person delivering the Company's comments, but both Cristina and I will be available for questions at the appropriate time.

1 Thank you for the opportunity to be with you today. It's almost become second
2 nature to say, "These are unprecedented times", and we've heard that phrase used
3 over and over but it's true: these are unprecedented times, but they are not
4 unprecedented in the sense of what Dominion Energy does every day to help its
5 customers and we're pleased to be here today to tell you our story – a story that is
6 steeped in dedication, compassion, and resilience.

7 When the crisis began, the Company immediately instituted mitigation
8 measures in response to the crisis for the benefit of its retail electric and natural gas
9 customers. We waived late-payment charges, ceased disconnections for non-
10 payment, and waived reconnection charges for those residential customers whose
11 service had been recently disconnected for non-payment. We've been doing this since
12 March 16 and we continue to do these things today.

13 When you established this virtual forum, you asked that we address specific
14 subjects, and I'm going to walk you through what we have done, and continue to do,
15 regarding each matter.

16 I'll start with on-line credit and processing fees. Dominion Energy is pleased
17 to inform the Commission that payment methods exist today for customers who wish
18 to avoid payment processing fees when transacting business online or with a credit
19 or debit card. Specifically, Dominion Energy customers may pay their bill online by
20 making an electronic payment which is deducted from their checking or savings
21 account. If a customer chooses this method of payment, then there is no processing
22 fee. Customers may also pay their bill online by making a payment with a credit card

1 or debit card. If they choose this payment option, then there is no processing fee
2 charged as long as the customer enrolls in paperless billing. With these measures in
3 place, customers possess the ability to avoid paying a processing or transaction fee
4 when conducting business with DESC, if they so choose.

5 With regard to late payment fees, the Company began waiving late-payment
6 charges on March 16, with permission from the Commission and we appreciate your
7 granting of that authorization to us. We are continuing to waive late-payment
8 charges today as I stated earlier, but at some point in the future, the Company will
9 resume late-payment charges. We have not yet made a final decision as to when to
10 resume late-payment charges, but when a date is selected, the Company will
11 communicate this information to its customers and intends to provide its customers
12 with adequate notice before resuming late-payment charges. We will also provide
13 notification to the Commission and the ORS.

14 Turning to returned check charges, when a customer writes a check to the
15 Company that is returned for insufficient funds, the Company charges that customer
16 a service fee in the amount of \$25.00. That fee is designed to cover the expenses that
17 we incur for processing the returned check; however, the Company has the ability to
18 waive a service fee on a case-by-case basis due to such things as multiple customer
19 checking account mistakes. DESC does not recommend that the Commission take
20 any action with respect to service fees originating from a returned check.

21 You also asked us to address credit reporting. The Company only reports
22 customer utility payment delinquency to credit reporting agencies when that

1 customer's account is final billed and written-off. In other words, the Company does
2 not report active customer utility accounts that may be delinquent to credit reporting
3 agencies. When an account is final billed and written-off, DESC has exhausted all
4 internal remedies to obtain collection of the account and referrals to customer
5 assistance agencies. Bad debt expense that results from uncollectible accounts is a
6 component of the Company's electric and natural gas rates. It is important to
7 understand, however, that arrears do not necessarily transmute into write-off. As we
8 have stated in our comment letter, DESC is offering its customers multiple methods
9 of financial assistance to pay their energy bills which should have the effect of
10 decreasing customer arrears that may otherwise convert to write-off.

11 As for the use of credit reporting agency information to determine customer
12 creditworthiness, DESC will only contact a credit reporting agency for this purpose
13 at the time a customer requests new service. The purpose of contacting the credit
14 reporting agency is to verify the customer's identity and to determine whether the
15 customer must pay a security deposit. If a customer requests that DESC not contact
16 a credit reporting agency seeking information regarding a deposit requirement, then
17 DESC will honor the customer's request, but the Company will require that the
18 customer post the appropriate amount of security prior to connecting service. After
19 new service is initiated, DESC does not contact a credit reporting agency for updated
20 information regarding the customer. Due to the very limited nature in which DESC
21 contacts a credit reporting agency, the Company does not believe that any changes to
22 its processes are necessary.

1 You also wanted to hear from us regarding communications related to safety
2 net provisions. Beginning with May bills, the Company began proactively offering
3 certain customers in arrears an opportunity to participate in budget billing.
4 Customers in arrears are not normally eligible for budget billing. The sole reason for
5 expanding our budget billing offer in May to certain customers in arrears is to provide
6 these customers with an additional form of economic assistance which will help them
7 spread their past due amount over 12 months. DESC is trying to make this process
8 as easy as possible, therefore customers do not need to call the Company to enroll in
9 budget billing. Instead, customers can simply select the budget billing payment
10 amount offered on their paper or online bill to enroll in the program.

11 Throughout the pandemic, the Company has provided numerous updates to
12 customers in multiple ways – email, social media, web/mobile, bill messaging, media
13 interviews, and press releases. Updates have covered –the Company’s moratorium on
14 disconnecting service, energy efficiency and energy savings tips, scam awareness,
15 available bill pay assistance, efficient ways to do business with the Company,
16 Company operations during the pandemic and the Company’s response to storms. We
17 continue to be most proud of our excellent record of outage restoration when our
18 customers and our system are affected by bad weather. And, we continue to improve
19 outage reporting options for our customers, with over 90% of outages reported via
20 self-service channels when storms and tornadoes hit our service territory in April.

21 The Company works closely with the South Carolina Office of Economic
22 Opportunity to connect customers with community action agencies, which have

1 received increased federal funding for energy assistance programs. Our Web Pledge
2 process allows over 180 agencies statewide to quickly allocate funds to specific
3 customer accounts. This process has proved most helpful as the Company, community
4 agencies, and our state partners transition back to normalcy.

5 During the COVID-19 crisis, the Company through the Dominion Energy
6 Charitable Foundation has also made financial contributions to programs that
7 support the Company's customers. On March 23, 2020, we contributed \$125,000 to
8 the One SC Fund to support a collaborative statewide response to the COVID-19
9 pandemic. This contribution was part of the Dominion Energy Charitable
10 Foundation's \$1 million commitment to support national organizations, such as the
11 American Red Cross, as well as to address local needs. In addition, the Company's
12 Charitable Foundation has committed \$50,000 to Harvest Hope Food Bank, which
13 provides an invaluable service by helping our customers who struggle with food
14 insecurity and hunger. DESC is pleased to be able to make these contributions and
15 will be evaluating other ways to provide additional financial support to our
16 communities during the COVID-19 crisis.

17 Additionally, on May 19, 2020, Dominion Energy finalized the expansion of
18 EnergyShare into South Carolina with a \$250,000 donation to the program, which is
19 administered through the South Carolina Office of Economic
20 Opportunity. EnergyShare is Dominion Energy's year-round energy assistance
21 program that helps qualified low-income, disabled and elderly customers with bill
22 payment assistance for their electric and natural gas services. Funds donated to the

1 program will be allocated among the 12 community action agencies in our service
2 territory. In addition to Dominion Energy's corporate contribution, which is funded
3 by shareholder dollars, the South Carolina Office of Economic Opportunity will also
4 continue to receive a monthly check for EnergyShare program funds through
5 voluntary donations from the Company's customers, employees and retirees. Since
6 the predecessor program, ProjectShare, was started in 1986, more than \$9.2 million
7 in contributions have assisted DESC customers with their heating and cooling needs.
8 In 2019 alone, DESC customers, employees and retirees contributed \$155,000 to the
9 program.

10 You also asked for information regarding our plans to return to normal
11 operations. Back in March, the Company instituted mandatory teleworking for all
12 employees able to do so, and it instructed its "Ready Reserve Employees" to stay
13 home. This strategy has served DESC and its customers well as evidenced by the
14 reliable service provided by the Company during these difficult times, including the
15 severe weather that spawned tornadoes across South Carolina on April 13. I can tell
16 you from a personal viewpoint that I'm ready to return to my office, and my day will
17 come but for now the Company is taking a phased-in approach.

18 Phase 1 reintegration focuses on employees whose job duties are completed in
19 the field as well as essential work that cannot be done through teleworking. This
20 covers a range of roles, from linemen and technicians to mechanics and operations
21 managers, each with a unifying goal: strengthening DESC's ability to keep the power
22 on and gas flowing, both today and long term. Phase 1 was initiated on May 11.

1 Phase 2 will focus on employees who are able to perform some of their job
2 functions remotely, but also have a need to be present in the office. This covers those
3 employees, for example, who need to utilize specialized equipment to create drawings
4 or other engineering plans. These employees could be present in the office during
5 certain days of the week and not present on other days. The Company will implement
6 Phase 2 on June 8, 2020. Before I talk about Phase 3, I want to quickly bring to
7 your attention that our customer contact center representatives are not included in
8 Phase 1 nor Phase 2. These dedicated employees are able to adequately perform their
9 job duties by teleworking technology. During the pandemic crisis, 70% of our
10 customer contact center representatives have been assisting customers directly from
11 their homes, as have employees that support customer contact center technology,
12 training and quality review. The Company's experience with having a high
13 percentage of customer contact center representatives working at home has been
14 positive and there is no need to rush these employees back into the office.

15 Finally, Phase 3 focuses on those employees who can perform their job duties
16 remotely and who do not have an immediate need to return to the office. Phase 3
17 covers those employees who perform services-related functions such as lawyers and
18 accountants. DESC intends to implement Phase 3 no sooner than September 8, 2020.
19 Like DESC's customer contact service representatives, these employees are
20 adequately performing their job duties at home and there is no need to accelerate
21 their return to the office.

1 We know you are also interested in when the Company will resume
2 disconnections, but we have not yet decided when we will resume disconnections for
3 non-payment. When a date is selected, we will communicate this information to you,
4 the ORS, and our customers. We will also provide our customers with the appropriate
5 disconnection notice as required by Commission regulations before disconnecting
6 service.

7 I want to conclude by stating that the COVID-19 crisis has been difficult for
8 everyone. It's been difficult for me, it's been difficult for Cristina, and I have no doubt
9 it's been difficult for you. All of our lives have been disrupted, but through it all, here
10 we are, doing what we all do best - ensuring that customers are being taken care of
11 and that the energy continues to flow in a reliable and safe manner, and I'm proud to
12 be a part of this effort. Every day, Dominion Energy's employees in South Carolina
13 work tirelessly to provide safe, reliable service to our customers and to do their part
14 to make our state a better place. We focus on system operations, reducing customer
15 effort and improving our customers' experiences. In my 31 years with the Company,
16 I remain most proud of the women and men that so faithfully serve.

17 Thank you again Mr. Chairman and members of the Commission. This
18 concludes the summary of our comments. Cristina and I are available for any
19 questions that you may have.